1	Carol V. Gilden ( <i>pro hac vice</i> ) COHEN MILSTEIN SELLERS & TOLL PLLC	William Savitt ( <i>pro hac vice</i> ) Noah B. Yavitz ( <i>pro hac vice</i> )
2	190 South LaSalle Street	Emily R. Barreca (pro hac vice) WACHTELL, LIPTON, ROSEN &
3	Suite 1705 Chicago, IL 60603	KATZ
4	Telephone: (312) 357-0370 Facsimile: (312) 357-0369	51 West 52nd Street New York, NY 10019
5	Email: cgilden@cohenmilstein.com	Telephone: (212) 403-1000
	Lead Counsel for Plaintiffs and the Class	Facsimile: (212) 403-2000
6	Nicole Lavallee (CA SBN 165755)	Jordan Eth (CA SBN 121617)
7	Alexander S. Vahdat (CA SBN 284963)	David J. Wiener (CA SBN 291659) MORRISON & FOERSTER LLP
8	BERMAN TABACCO 425 California Street, Suite 2300	425 Market Street
	San Francisco, CA 94104	San Francisco, CA 94105 Telephone: (415) 268-7000
9	Telephone: (415) 433-3200 Facsimile: (415) 433-6382	Facsimile: (415) 268-7522
10	Email: nlavallee@bermantabacco.com	Email: JEth@mofo.com
11	avahdat@bermantabacco.com	DWiener@mofo.com
	Liaison Counsel for Plaintiffs and the Class	Attorneys for Defendants Bayer
12	[Additional Counsel on Signature Page]	Aktiengesellschaft, Werner Baumann,
13		Werner Wenning, Liam Condon, Johannes
		Dietsch, and Wolfgang Nickl
14		
14	UNITED STATES DISTI	RICT COURT
14 15	NORTHERN DISTRICT O	F CALIFORNIA
		F CALIFORNIA DIVISION
15 16	NORTHERN DISTRICT OF SAN FRANCISCO DE SHEET METAL WORKERS' NATIONAL	F CALIFORNIA DIVISION  Case No: 3:20-cv-04737-RS
15 16 17	NORTHERN DISTRICT OF SAN FRANCISCO DE SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS	Case No: 3:20-cv-04737-RS  CLASS ACTION
15 16	NORTHERN DISTRICT OF SAN FRANCISCO DE SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND,	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND
15 16 17	NORTHERN DISTRICT OF SAN FRANCISCO DE SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS	Case No: 3:20-cv-04737-RS  CLASS ACTION
15 16 17 18	NORTHERN DISTRICT OF SAN FRANCISCO DE SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20	NORTHERN DISTRICT OF SAN FRANCISCO DESTRICT OF SAN FRANCISCO DESTRUCTION OF SAN FRANCISCO DESTRUCTOR DESTRUC	F CALIFORNIA DIVISION  Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER
15 16 17 18 19 20 21	NORTHERN DISTRICT OF SAN FRANCISCO DESAN FRANCISCO DESAN FRANCISCO DESAN FRANCISCO DESAN FRANCISCO DESAN FRANCISCO DESAN FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20 21	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and  INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others similarly situated,	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20 21 22	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20 21 22 23 24	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and  INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others similarly situated,	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER  Ctrm: 3 – 17th Floor
15 16 17 18 19 20 21 22 23 24 25	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and  INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others similarly situated,  Plaintiffs,  vs.  BAYER AKTIENGESELLSCHAFT, WERNER	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING  ORDER  Ctrm: 3 – 17th Floor Judge: Richard Seeborg
15 16 17 18 19 20 21 22 23 24	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and  INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others similarly situated,  Plaintiffs,  vs.  BAYER AKTIENGESELLSCHAFT, WERNER BAUMANN, WERNER WENNING, LIAM CONDON,	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING  ORDER  Ctrm: 3 – 17th Floor Judge: Richard Seeborg
15 16 17 18 19 20 21 22 23 24 25	SHEET METAL WORKERS' NATIONAL PENSION FUND and INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION FUND, individually and as Lead Plaintiffs on behalf of all others similarly situated, and  INTERNATIONAL UNION OF OPERATING ENGINEERS PENSION FUND OF EASTERN PENNSYLVANIA AND DELAWARE, individually and as Named Plaintiff, on behalf of all others similarly situated,  Plaintiffs,  vs.  BAYER AKTIENGESELLSCHAFT, WERNER	Case No: 3:20-cv-04737-RS  CLASS ACTION  JOINT STIPULATION AND [PROPOSED] SCHEDULING  ORDER  Ctrm: 3 – 17th Floor Judge: Richard Seeborg

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Pursuant to Local Rule 6-2, the parties respectfully request the following:

WHEREAS, on January 10, 2025, the Court issued an amended scheduling order in this proceeding (ECF No. 233), setting deadlines for the filing of dispositive motions, oppositions and replies to such motions, and a hearing on pretrial motions;

WHEREAS, on February 25, 2025, the parties filed a joint notice of settlement (ECF No. 244), notifying the Court that the parties had reached a settlement in principle in the above-captioned matter and that upon finalizing the terms of the settlement agreement and establishing a class action notice and administration plan, Plaintiffs would file an unopposed motion for preliminary approval of the class action settlement;

WHEREAS, subsequently on February 25, 2025, the Court ordered that the parties file a motion for preliminary approval of class action settlement on or before April 11, 2025 (ECF No. 245) and entered a notice vacating a case management conference set for March 27, 2025 (ECF No. 246);

WHEREAS, the parties have conferred regarding the currently scheduled deadlines for the filing of any dispositive motions and any oppositions and replies to such motions and the currently scheduled deadline for the hearing of any pretrial motions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiffs<sup>1</sup> and Defendants by and through their respective counsel and subject to the approval of the Court, that:

- The deadlines for the filing of any dispositive motions, any oppositions to dispositive motions, and any replies to dispositive motions are stayed pending the Court's review of the proposed settlement.
- 2. The deadline for the hearing of any pretrial motions is stayed pending the Court's review of the proposed settlement.

IT IS SO STIPULATED.

<sup>1</sup> Plaintiffs include Lead Plaintiffs Sheet Metal Workers' National Pension Fund and International Brotherhood of Teamsters Local No. 710 Pension Fund, and additional plaintiff International Union of Operating Engineers Pension Fund of Eastern Pennsylvania and Delaware.

1	Dated:	March 24, 2025		
2			By:	/s/ David J. Wiener David J. Wiener
3				William Savitt (pro hac vice)
4				Noah B. Yavitz (pro hac vice) Emily R. Barreca (pro hac vice)
5				WACHTELL, LIPTON, ROSEN & KATZ 51 West 52nd Street New York, NY 10019
6 7				Telephone: (212) 403-1000 Facsimile: (212) 403-2000
8				Email: WDSavitt@wlrk.com NBYavitz@wlrk.com
9				ERBarreca@wlrk.com
10				Jordan Eth (CA SBN 121617) David J. Wiener (CA SBN 291659) MORRISON & FOERSTER LLP
11				425 Market Street San Francisco, CA 94105
12				Telephone: (415) 268-7126
13				Facsimile: (415) 268-7522 Email: JEth@mofo.com
14				DWiener@mofo.com
15				Attorneys for Defendants Bayer Aktiengesellschaft, Werner Baumann, Werner Wenning, Liam Condon,
16				Johannes Dietsch, and Wolfgang Nickl
17				
18			By:	/s/ Carol V. Gilden Carol V. Gilden
19				Carol V. Gilden (pro hac vice)
20				COHEN MILSTEIN SELLERS & TOLL PLLC 190 South LaSalle Street, Suite 1705
21				Chicago, IL 60603 Telephone: (312) 357-0370
22				Facsimile: (312) 357-0369 Email: cgilden@cohenmilstein.com
23				•
24				Steven J. Toll (pro hac vice) COHEN MILSTEIN SELLERS & TOLL PLLC
25				1100 New York Ave NW, Suite 800 Washington, DC 20005
26				Telephone: (202) 408-4600 Facsimile: (202) 408-4699
27				Email: stoll@cohenmilstein.com
28				Chris Lometti (pro hac vice)
				JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER CASE NO.: 3:20-CV-04737-RS

Benjamin F. Jackson (pro hac vice) 1 COHEN MILSTEIN SELLERS & TOLL PLLC 2 88 Pine Street, Fourteenth Floor New York, NY 10005 Telephone: (212) 838-7797 Facsimile: (212) 838-7745 3 Email: clometti@cohenmilstein.com 4 bjackson@cohenmilstein.com 5 Lead Counsel for Plaintiffs and the Class 6 Nicole Lavallee (SBN 165755) Alexander S. Vahdat (SBN 284963) **BERMAN TABACCO** 8 425 California Street, Suite 2300 San Francisco, CA 94104 9 Telephone: (415) 433-3200 10 Facsimile: (415) 433-6382 Email: nlavallee@bermantabacco.com 11 avahdat@bermantabacco.com 12 Liaison Counsel for Plaintiffs and the Class 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

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1	CERTIFICATE PURSUANT TO LOCAL RULE 5-1(i)(3)			
2	In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of			
3	this document has been obtained from each of the other signatories.			
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6	By: <u>/s/ David J. Wiener</u>			
7	David J. Wiener			
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1		ORDER GRANTING STIPULATION		
2		PURSUANT TO STIPULATION, IT IS SO ORDERED.		
3				
4	Date:			
5		HONORABLE RICHARD SEEBORG UNITED STATES DISTRICT JUDGE		
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